

Author: Robert Danner at FNST-06

Date: 7/7/99 12:21 PM

Normal

TO: Diana Rayer at FNUN-01

CC: Elizabeth Brucken

Subject: Fernald's Annual HW Report

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Forward Header

Subject: Fernald's Annual HW Report

Author: "Paula Canter" <paula.canter@epa.state.oh.us> at FE-INTERNET

Date: 6/29/1999 11:50 AM

Bob, here are my questions and corrections for Fernald's 1998 Annual HW Report:

CORRECTION

GM page 339, cumene hydroperoxide - I changed the quantity to 1 since we can't enter decimals.

QUESTIONS

GM page 21, hydraulic oil from baler in drum reconditioning - Origin Code is a 1 but the Source Code is A69, Other Remediation. If the Source is correct, the Origin should be a 2.

GM page 59, lead solder joints - Origin Code is a 2 but the Source Code is A99. If the Origin is correct, the Source Code needs changed to something in the A61-A69 category, I would assume.

GM pages 87, 89, 113, 117, 147 - The Origin Code on all these pages is 4, received from off-site and not treated on-site. Typically this is used only by commercial TSD facilities to indicate storage/transfer. Can you refresh my memory on where these wastes came from, so I can advise you on the proper Origin Code? If they were samples that were returned, I'd say 1 might be better. If they originated from other generators, then indeed 4 would be preferred.

GM pages 207, 209, 211; batch tank bottoms - The Origin Code is a 2 and the Source Code is A60. If remediation is the Origin, then you should use A61-A69 Source Codes rather than A60.

GM page 216, liquids for the TSCA incinerator - The Origin Code is a 2 and the Source Code is A59. If remediation is the Origin, then you should use A61-A69 Source Codes rather than A59.

GM page 219, expired organic standards - The Origin Code is a 2 and the Source Code is A94. If remediation is the Origin, then you should use A61-A69 Source Codes rather than A94.

GM page 225, treated HF - My "business rules" state that A69 has to be an Origin Code of 2. Residuals of treatment are an Origin Code of 5, which is what is on the page. Therefore we need to decide which is more important, indicating that it is a treatment residual or a remedial origin. Since the generation quantity is 0, the Source Code for this page has little impact on any data analysis that doesn't involve end-of-year storage. (I don't do much analysis with storage data.) I lean toward using a Source Code in the Waste Treatment Processes category, A71-A89.

GM page 409, 1,1,1-trichloroethane still bottoms - Still bottoms are residuals from recycling and therefore should be an Origin Code of 5 and a system type code of M021 (for distillation). The Source Code would be A73 for solvent recovery. If the waste is not really still bottoms, then what you have would be ok. I have noticed that some people tend to use this term loosely. Let me know if you want to change this page.

You can reply via e-mail or call me at 614-644-2923. If you send an e-mail, I'll print it, make any corrections needed, and attach the printout to the report to document the changes. Please call if there are any questions.

Thanks,
Paula Canter
Ohio EPA, DHWM

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